

From: Dominic Giampaolo
To: Microsoft ATR
Date: 1/23/02 11:31am
Subject: Microsoft Settlement

Hello,

I would like to voice my opinion on the Microsoft Settlement. I am encouraged by many of the restraints the settlement imposes on Microsoft's behaviour. As a software developer however, it is clear that a few additions and modification need to be made for the settlement to offer a viable development path for third parties.

The biggest stumbling block to developing competing products is that Microsoft does not document their file formats well enough (or in a timely fashion) nor do they always document all of their API's completely. Without this critical information developers can not make products that work well with Microsoft tools nor can they do it in a reasonable time frame.

Consider the case of a Microsoft Word document (a ".doc" file). If you want to develop software to read or write that file format you must reverse-engineer the format or use Microsoft's woefully inadequate documentation of the format. This insures that your products will be perceived as inferior to Microsoft's. Further their published documentation often does not match what their applications write out in practice since they regularly change the file format and do not document the changes. This is a costly area of development for a third party and one that is a never-ending battle. Unless the file format information is accurate and complete you can never develop a product that the market will perceive as anything other than a second class citizen to Microsoft's products.

In the area of Windows API's, the same thing happens. Microsoft applications will use undocumented API's, lending them features that require external developers considerable more time to implement.

I feel that the settlement proposal should include provisions to ensure that Microsoft releases complete, correct file format and API documentation in a timely fashion *before* the commercial release of a product. Without this, third party developers will never be able to compete on a level playing field with Microsoft.

I hope that my opinions echo those of others and that you'll consider my remarks carefully.

thank you,
--dominic giampaolo

